

1 PAUL J. PASCUZZI, State Bar No. 148810
2 JASON E. RIOS, State Bar No. 190086
3 THOMAS R. PHINNEY, State Bar No. 159435
4 FELDERSTEIN FITZGERALD WILLOUGHBY
5 PASCUZZI & RIOS LLP
6 500 Capitol Mall, Suite 2250
7 Sacramento, CA 95814
Telephone: (916) 329-7400
Facsimile: (916) 329-7435
Email: ppascuzzi@ffwplaw.com
jrios@ffwplaw.com
tphinney@ffwplaw.com

8 ORI KATZ, State Bar No. 209561
9 ALAN H. MARTIN, State Bar No. 132301
10 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
11 A Limited Liability Partnership
12 Including Professional Corporations
13 Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
Telephone: (415) 434-9100
Facsimile: (415) 434-3947
Email: okatz@sheppardmullin.com
amartin@sheppardmullin.com

14 Attorneys for The Roman Catholic Archbishop of
San Francisco

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

18 In re Case No. 23-30564
19 THE ROMAN CATHOLIC ARCHBISHOP Chapter 11
OF SAN FRANCISCO,
20 Debtor and DECLARATION
21 Debtor in Possession. SUPPORT OF DE
MOTION TO EX

**DECLARATION OF JASON E. RIOS IN
SUPPORT OF DEBTOR'S SECOND
MOTION TO EXTEND DEADLINE TO
ASSUME OR REJECT UNEXPIRED
LEASES OF NONRESIDENTIAL REAL
PROPERTY PURSUANT TO SECTION
365(d)(4) OF THE BANKRUPTCY CODE**

Date: March 7, 2024
Time: 1:30 p.m.
Location: via ZoomGov
Judge: Hon. Dennis Montali

29 | //

I, Jason E. Rios, declare:

1. I am an attorney duly licensed to practice law in the State of California and a partner with Felderstein Fitzgerald Willoughby Pascuzzi & Rios, LLP, attorneys for The Roman Catholic Archbishop of San Francisco, the debtor and debtor in possession herein (“RCASF” or “Debtor”). I submit this Declaration in support of the Debtor’s Second Motion to Extend Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code (the “Motion”)¹. If called as a witness, I would and could testify competently to the matters stated herein.

9 2. Attached as ***Exhibit B*** to the Motion are true and correct copies of the Stipulations
10 entered into between the Consenting Lessors/Counterparties and the Debtor referred to in the
11 Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 8, 2024 at Sacramento, California.

/s/ Jason E. Rios
JASON E. RIOS

²⁷ ²⁸ ¹ Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such terms in the Motion.